



# Code of ethics

for suppliers

GARRIGUES

## 1. Introduction

J&A GARRIGUES, S.L.P., GARRIGUES PORTUGAL, S.L.P. and all companies in the GARRIGUES group (“GARRIGUES” or the “Firm”) have a Code of Ethics, published on the Firm’s website, which contains the values and principles that underpin the identity of the Firm, as well as the guidelines and rules of conduct that constitute the ethical model of behavior that must govern the actions of all members of the Firm, both internally and in their dealings with clients and third parties in general.

GARRIGUES expects and requires all of its suppliers to make a commitment to comply with the legislation applicable to them, and to act ethically and responsibly in the pursuit of their activity and, in particular, in their dealings with the Firm and/or with any of its members. Therefore, and in order to specify what this commitment entails, GARRIGUES has established the following Code of Ethics for Suppliers (the “Code” or the “Code of Ethics”), which must be expressly accepted by all suppliers of GARRIGUES.

## 2. Compliance and business ethics

### ■ Compliance with the law

Our suppliers undertake to comply with the domestic and international legislation in force and applicable to them in all areas of their activity and, in particular, as regards their relationship with GARRIGUES, and to put in place the appropriate measures to ensure their employees, partners and other persons acting on their behalf do so in compliance with the applicable legislation.

### ■ Commitment to ethical conduct

GARRIGUES’ suppliers must conduct themselves in an ethical and honest manner and with integrity in all their activities.

Not only must they act in strict compliance with the law in their dealings with GARRIGUES, but they must also refrain in all cases from engaging in any conduct which, while lawful, could be viewed as reprehensible or questionable from an ethical point of view.

### ■ Measures to combat corruption, bribery and extortion

GARRIGUES rejects any conduct that is reproachable or questionable from either a legal or ethical standpoint and, in particular, any form of corruption, bribery or extortion, and defends the need to safeguard fair competition in the market and to ensure that public services operate with the highest level of objectivity and impartiality.

Our suppliers undertake to comply with the domestic and international legislation against corruption, bribery and extortion which is applicable to them, and to combat any behavior that may fall within these concepts, or within others such as bribery involving public officials and trading in influence.

In particular, they undertake:

(i) not to directly or indirectly offer, grant or promise to any authority, public official, third party or member of GARRIGUES any unjustified reward, favor, compensation or advantage of any kind, for them or for a third party; and not to directly or indirectly receive, solicit or accept from any authority, public official, third party or member of GARRIGUES any unjustified reward, favor, compensation or advantage of any kind, for themselves or for a third party, all with a view to unduly benefitting GARRIGUES and/or any of its members;

(ii) not to directly or indirectly exercise influence over any authority, public official or third party, using for such purpose their personal, professional or hierarchical relationship with them, with a view to unduly benefitting GARRIGUES and/or any of its members;

(iii) not to directly or indirectly offer, grant or promise to any member of GARRIGUES any unjustified reward, favor, compensation or advantage of any kind, for themselves or for a third party; and not to directly or indirectly receive, solicit or accept, from any member of GARRIGUES, any unjustified reward, favor, compensation or advantage of any kind, for themselves or for a third party, all with a view to influencing the engagement of the supplier's services by GARRIGUES (both in the act of engaging and the terms of same) and/or obtaining any undue advantage.

GARRIGUES' suppliers also undertake to require fulfillment of the above undertaking by their own suppliers and any business partners they may deal with in the course of their commercial relationship with the Firm.

## ■ **Conflicts of interest in engaging suppliers**

It is important to GARRIGUES for suppliers to be assessed, selected and engaged in a way that ensures transparency, equal treatment and the application of objective and properly-weighted criteria.

GARRIGUES' suppliers undertake to act transparently in their commercial practices and to adopt all measures necessary to avoid any situation that could lead to a conflict of interest as regards their dealings with the Firm.

If, during the course of the commercial relationship with GARRIGUES, suppliers become aware that there is or may be a potential conflict of interest, they must inform GARRIGUES immediately so that it can be dealt with appropriately.

## ■ **Competition and antitrust regulations**

GARRIGUES' suppliers undertake to comply with the domestic and international competition and antitrust regulations in force.

## ■ **Confidentiality**

GARRIGUES' suppliers must maintain the confidentiality of any information to which they may have had access during their commercial relationship with GARRIGUES, ensuring that the confidential information to which they may have had access will

not be used for their own personal benefit or the benefit of third parties under any circumstances.

### **3. Human and workers' rights**

GARRIGUES' suppliers undertake to comply with the applicable labor legislation and not to contravene any of the principles established in the United Nations Global Compact, of which GARRIGUES is a signatory, and to offer, in the course of their functions, effective compliance with all obligations flowing from such principles.

Specifically, suppliers undertake:

- To support and respect the protection of internationally proclaimed human rights within their sphere of influence.
- To make sure that they are not complicit in human rights abuses.
- To uphold the effective abolition of child labor and not hire people who have not reached the legal minimum age for employment.
- To reject all forms of forced and compulsory labor.
- To respect and guarantee the freedom of association and right to collective bargaining of all of their employees.
- To comply with occupational health and safety legislation and put in place the necessary measures within their organizations to ensure healthy working conditions for their employees.
- To reject any kind of discrimination on the grounds of race, color, nationality, social origin, age, gender, marital status, sexual orientation, ideology, political views, religion or any other personal, physical or social condition of their members, and promote equal opportunities.

### **4. Environment**

GARRIGUES' suppliers undertake to comply with the environmental legislation and standards applicable in all of the countries in which they operate. In particular, they undertake not to contravene principles combatting climate change and to promote environmental protection and foster innovation and use of the clean or low-impact technologies established in the UN Global Compact, of which GARRIGUES is a signatory.

### **5. Information security**

GARRIGUES' suppliers undertake to familiarize themselves with the Information Security Policy, published on the GARRIGUES website, to duly comply with the obligations deriving from same, to establish specific incident reporting and resolution

procedures, and to ensure that their personnel are sufficiently security-aware, at least to the same level as established in the Information Security Policy.

## **6. Supervision of compliance with the Code of Ethics for Suppliers**

GARRIGUES reserves the right to verify compliance with this Code of Ethics by its suppliers.

If GARRIGUES finds that there has been a breach of the points of this Code, it may ask the supplier to take the necessary steps to remedy such breach within a reasonable time period.

Notwithstanding the foregoing, GARRIGUES reserves the right to terminate any contract or commercial relationship with the supplier in the case of serious breach by the supplier of the provisions of this Code.

\_\_\_\_\_ agrees with and accepts the contents of this Code of Ethics for Suppliers.

Signed by: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

Signature and stamp of the supplier: